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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 JAIME ADALBERTO ESPINOSA-RAMOS,

19 Defendant.

20 Case No. 2:24-mj-00306-BNW

21 **STIPULATION TO VACATE  
22 PRELIMINARY HEARING IN THIS  
23 DISTRICT**

24 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
25 United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel for  
26 the United States of America, and Rene L. Valladares, Federal Public Defender, and  
Heidi A. Ojeda, Assistant Federal Public Defender, counsel for Jaime Adalberto Espinosa-  
Ramos, that the Preliminary Hearing currently scheduled on June 17, 2024, be vacated. Mr.  
Espinosa-Ramos reserves the right to have his preliminary hearing in the District of Utah.

27 This Stipulation is entered into for the following reasons:

28 1. Mr. Espinosa-Ramos just recently made his initial appearance in Utah. The  
29 Minutes of Proceedings indicate that Mr. Espinosa-Ramos reserved his right to request a  
30 preliminary hearing in Utah.

1           2. Undersigned counsel just recently confirmed with local Utah counsel that Mr.  
2 Espinosa-Ramos waives his right to a preliminary hearing in the District of Nevada and elects  
3 to reserve his right to a preliminary hearing in the District of Utah.

4           4. Defendant is incarcerated.

5           5. The parties therefore request that the Court vacate the preliminary hearing in  
6 this matter.

7           DATED this 16th day of June, 2024.

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9           RENE L. VALLADARES  
10           Federal Public Defender

11           JASON M. FRIERSON  
12           United States Attorney

13           By /s/ Heidi A. Ojeda  
14           HEIDI A. OJEDA  
15           Assistant Federal Public Defender

16           By /s/ Daniel J. Cowhig  
17           DANIEL J. COWHIG  
18           Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

JAIME ADALBERTO ESPINOSA-RAMOS,

Defendant.

Case No. 2:24-mj-00306-BNW

## ORDER

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on June 17, 2024 at the hour of 3:00 p.m., be VACATED.

IT IS FURTHER ORDERED that Mr. Espinosa-Ramos reserves his right to a preliminary hearing in the District of Utah.

DATED this 17 day of June, 2024.

Ben Lowenkop  
UNITED STATES MAGISTRATE JUDGE